

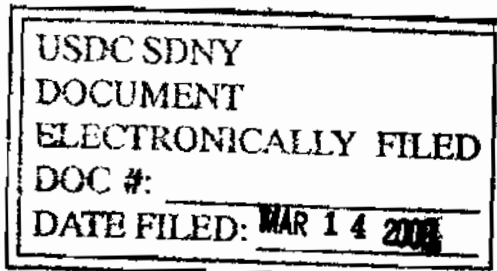
THE HOFFMAN LAW FIRM

330 WEST 72ND STREET

NEW YORK, N.Y. 10023

TELEPHONE: 212 873 6200

FACSIMILE 212 974 7245



BARBARA T. HOFFMAN
artlaw@mindspring.com
www.hoffmanlawfirm.org

March 12, 2008

VIA FACSIMILE

SO ORDERED

Honorable George B. Daniels
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Room 630
New York, NY 10007

George B. Daniels
HON. GEORGE B. DANIELS

Re: Barbara Broughel v. The Battery Conservancy, et al., 1:07-cv-7755

MAR 14 2008

Dear Judge Daniels:

I am the counsel for the Plaintiff Barbara Broughel.

I am writing to you on behalf of all counsel in the above-captioned case. The purpose of this letter is to seek your consent to a modification of the motion briefing schedule brought about by the Defendants' Motion for Judgment on the Pleadings.

I initially requested that opposing counsel extend my time to answer the motion and to cross move by two weeks. I am a sole practitioner. As you may recall, at the request of Judge Daniels, counsel requested a rescheduling of the conference to determine whether a stay should issue pending the decision on the motions. Counsel have requested that that conference scheduled for the 18th of March be set over to the 1st of April.

In connection with the case before Judge Sullivan, on Thursday, I will fly to Texas for depositions, and then Monday, March 17 through March 25, I will have depositions every day except on March 19 when I will have eye surgery. The latter may interfere with my vision for some days.

Counsel for the Defendants have consented to a two-week extension with my motion papers due on March 31 on condition (i) that their reply brief shall be due on April 21, 2008, and (ii) Plaintiff agrees that no discovery will be conducted or sought during the period prior to April 21, 2008.

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Plaintiff consents to these conditions. In view of the foregoing, counsel for all parties respectfully requests that the Court so order the above modifications to the schedule.

Respectfully submitted,



Barbara Hoffman

cc: Margaret Pfeiffer *(via facsimile)*
Jarrett M. Behar *(via facsimile)*
Barbara Broughel *(via email)*